

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ANDRE HEYWARD, Individually, and  
ROGER A. KIRSCHENBAUM, as  
Administrator of the Estate of  
MICHELLE KAMIKA CHINNIS,  
deceased,

Plaintiff

v.

ABCO TRANSPORTATION, INC.,  
R&L TRANSFER, INC., ROBERT J.  
SANSOM, PROTECTIVE  
INSURANCE COMPANY, and  
LEXINGTON INSURANCE  
COMPANY,

Defendants.

CIVIL ACTION  
FILE NO. 13-CV-03637-LMM

**STIPULATION OF DISMISSAL WITH PREJUDICE**

COME NOW the parties in the above styled matter and, in accordance with Rule 41 of the Federal Rules of Civil Procedure, hereby stipulate to the voluntary dismissal with prejudice of all claims against Defendants. The parties further stipulate that each party shall bear their own costs incurred in this matter.

*[Signature lines on following page]*

Respectfully submitted on January 28, 2015.

LAW & MORAN

/s/ E. Michael Moran

Peter A. Law, Esq.  
Georgia State Bar No. 439655  
E. Michael Moran, Esq.  
Georgia State Bar No. 521602  
Edward A. Piasta, Esq.  
Georgia State Bar No. 110161  
563 Spring Street, NW  
Atlanta, GA 30308  
Telephone: (404) 814-3700  
Facsimile: (404) 842-7710  
E-mail: [pete@lawmoran.com](mailto:pete@lawmoran.com)  
E-mail: [mike@lawmoran.com](mailto:mike@lawmoran.com)  
E-mail: [ed@lawmoran.com](mailto:ed@lawmoran.com)

Attorneys for Plaintiffs

BAKER, DONELSON, BEARMAN  
CALDWELL & BERKOWITZ, PC

/s/ Michael W. Horst

L. Clint Crosby, Esq.  
Georgia State Bar No. 197877  
Michael W. Horst, Esq.  
Georgia State Bar No. 367837  
Monarch Plaza, Suite 1600  
3414 Peachtree Road NE  
Atlanta, GA 30326  
Telephone: (404) 577-6000  
Facsimile: (404) 221-6501  
E-mail: [ccrosby@bakerdonelson.com](mailto:ccrosby@bakerdonelson.com)  
E-mail: [mhorst@bakerdonelson.com](mailto:mhorst@bakerdonelson.com)

Attorneys for Defendants ABCO  
Transportation, Inc., R&L Transfer,  
Inc., Robert J. Sansom, and Protective  
Insurance Company

CARLOCK COPELAND & STAIR, LLP

/s/ Charles M. McDaniel, Jr.

Charles M. McDaniel, Jr.  
Georgia State Bar No.: 487905  
L. Elizabeth Albright  
Georgia State Bar No.: 470111  
191 Peachtree Street NE, Suite 3600  
Atlanta, Georgia 30303-1740  
Telephone: (404) 522-8220  
Facsimile: (404) 523-2345  
E-mail: [cmcdaniel@carlockcopeland.com](mailto:cmcdaniel@carlockcopeland.com)  
E-mail: [balbright@carlockcopeland.com](mailto:balbright@carlockcopeland.com)

Attorneys for Defendant Lexington Insurance Company

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, January 28, 2015, I have electronically filed the foregoing STIPULATION OF DISMISSAL WITH PREJUDICE with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following counsel of record:

Peter A. Law, Esq.  
E. Michael Moran, Esq.  
Edward A. Piasta, Esq.  
Law & Moran  
563 Spring Street, NW  
Atlanta, GA 30308

Charles M. McDaniel, Jr., Esq.  
L. Elizabeth Albright, Esq.  
Carlock, Copeland & Stair, LLP  
191 Peachtree Street NE, Suite 360  
Atlanta, Georgia 30303-1740

BAKER, DONELSON, BEARMAN  
CALDWELL & BERKOWITZ, PC

/s/ Michael W. Horst

MICHAEL W. HORST

Georgia State Bar No. 367837